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9 WILLIAM A. VAN METER, ESQ.  
10 Nevada State Bar No. 2803  
11 P.O. Box 6630  
12 Reno, Nevada 89513  
13 (775) 324-2500

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15 Chapter 13 Trustee  
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17 UNITED STATES BANKRUPTCY COURT  
18  
19 DISTRICT OF NEVADA

20 In re:  
21 MICHELLE I. PEACON CASE NO. BK-N 19-50853-HLB  
22 CHAPTER 13

23  
24 **STIPULATION TO EXTEND**  
**TERM OF PLAN TO PAY**  
**SECURED CLAIM**

25 NO HEARING REQUIRED

26 Debtor. /

27 The Debtor, by and through their attorney, SEAN P. PATTERSON, ESQ. and the Standing Chapter  
13 Trustee, WILLIAM A. VAN METER, hereby agree and stipulate as follows:

28 1. The Debtor's Plan is short of funding all Secured and Priority claims. The Debtor has agreed  
29 to extend the plan from 50 to 52 months to pay the secured claims.

30 2. The Debtor intends to complete their Chapter 13 plan and agrees to cure the existing default

as well as any other deficiencies set forth in this Stipulation. The Trustee agrees not to request dismissal of the case based on the Debtor's default if the Debtor complies with the terms of this stipulation.

- a. The Debtor's plan payments shall remain current throughout the remaining term of the Debtor's Chapter 13 case.

b. In addition to funds paid to the Trustee as of August 17, 2023 in the amount of \$23,005.00, the Debtor's plan payments shall remain \$495.00 and the term of the plan will be extended from 50 months to 52 months. The total minimum plan base will be increased to \$24,490.00 to pay Secured and Priority Claims.

3. While this Stipulation may result in an increase in the Plan term, it is not intended to prejudice the distribution to holders of allowed unsecured claims.

4. This Stipulation is not intended to be a modification of the Debtor's confirmed Chapter 13 Plan and is intended to be binding only on the parties to the Stipulation.

Dated this 22<sup>nd</sup> Day of September 2023.

/S/ WILLIAM A. VAN METER

**WILLIAM A. VAN METER**  
Chapter 13 Trustee

Dated this 22<sup>nd</sup> Day of September 2023.

/S/SEAN P. PATTERSON

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SEAN P. PATTERSON  
Attorney for Debtor

MICHELLE I. PEACON  
Case # 19-50853  
STIPULATION TO EXTEND  
TERM OF PLAN TO  
PAY SECURED CLAIM

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Bankr. P. 9014, 7004 and Fed. R. Civ. P. 4(g), I Mary Rivinius  
hereby swear under penalty of perjury that I am over the age of 18, not a party to the within  
action, and that on April 25, 2022, I Electronically Filed the attached **STIPULATION TO**  
**EXTEND TERM OF PLAN TO PAY SECURED CLAIM** and that upon the filing of the  
**document I anticipate that the Bankruptcy Court will thereafter**  
generate a Notice of Electronic Filing and electronically transmit the document to:

5 | generate a Notice of Electronic Filing and electronically transmit the document to:

Dated: October 5, 2023

/S/ Mary Rivinius  
Mary Rivinius

0 SEAN P. PATTERSON, ESQ.  
1 232 COURT STREET  
2 RENO, NV 89501

MICHELLE I. PEACON  
340 LUCKY LANE  
RENO, NV 89502

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